

**REMARKS**

Base claims 1, 19 and 20 stand rejected as being fully anticipated by U.S. Pat. No. 5,216,612 (Cornett). Reconsideration of the rejections is solicited in view of the foregoing amendments and the following remarks.

Claims 1, 19 and 20 have been amended. Claim 2 has been cancelled.

**Cornett is of limited relevance.**

Cornett is directed to a computerized maintenance system that purportedly takes into account the scheduling of maintenance operations for a plurality of machines to reduce the downtime of a manufacturing plant. See Abstract of Cornett. It is respectfully submitted that Cornett's main applicability as expressly described by Cornett is directed to the *planning and scheduling* of maintenance operations, as opposed to a system used during the actual performance of such operations. For example, Cornett cites a mainframe computer, such as an IBM 3090 or desk computers as the devices for implementing such a maintenance system. See Cornett Col. 10, line 7 et. seq. It should become evident that for locomotive service personnel who is performing actual hands-on maintenance operations in the locomotive, as opposed to planning such operations *for future performance*, a mainframe or even a desk-top computer would be of little benefit since that service personnel needs to be physically and ergonomically unconstrained in order to efficiently and securely perform any such servicing operations for the locomotive. Below is a description of two different alternative grounds as to why claim 1 is not anticipated or otherwise rendered unpatentable by Cornett.

**Cornett fails to teach hand-held equipment for communication of information during performance of a servicing operation for a machine.**

More particularly, claim 1 is directed to a computerized method for servicing a locomotive and identifying replacement parts for selected locomotive equipment. A service personnel is equipped to perform the action of identifying the replacement parts, as that personnel performs a servicing operation for the locomotive. That is, the service personnel is equipped to effectively perform his or her task at the locomotive. Accordingly, claim 1 in part recites providing a hand-held input output device for wirelessly communicating with a database that comprises detailed parts data for each assembly of the selected locomotive equipment. In contrast to the claimed invention, Cornett is not concerned with communicating information to service personnel while that service personnel performs an actual repair of equipment while on site. Cornett is rather concerned with assisting a maintenance planner to arrange for the yearly or daily maintenance planning for the large number of machines that may be used in a manufacturing plant. The maintenance planner while carrying out the scheduling of a maintenance operation to be performed in the future can simply use a personal or desk-top computer at his or her desk and thus providing a hand-held input-output device to the maintenance planner as set forth in claim 1 is not taught or suggested by Cornett.

**Cornett fails to teach graphical hyperlinks for the identification of parts.**

Claim 1 further recites that each part is identified by providing a series of linked schematic representations of the selected assembly and any subassemblies thereof and respective parts. The series of linked schematic representations comprises a plurality of graphical hyperlinks embedded on respective visual representations of the selected locomotive equipment. Activation of at least some of the plurality of graphical hyperlinks embedded on

the respective visual representations of the selected locomotive equipment enables the service personnel to graphically navigate from the selected assembly to any relevant subassembly and replacement parts. By way of comparison, Cornett does not use any graphical hyperlinks embedded on respective visual representations of the selected locomotive equipment for selecting a piece of equipment to look at. In Cornett, the operator has to alternate from a graphical representation (shown on the left hand side of a display as represented in FIG. 10 of Cornett) to an alphanumeric listing of the various components (shown on the right hand side of the display). To a maintenance planner sitting at his or her desk, the incremental efforts of alternating or switching from one side to another side of the display may appear insignificant. However, to locomotive service personnel who have to be particularly mindful of safety issues while at the locomotive worksite servicing a locomotive, the ability to directly click on a graphical representation of the equipment then being serviced to quickly and accurately identify the correct replacement part provides an advantage that cannot be underestimated for more reliable servicing of complex and powerful pieces of equipment such as a locomotive. Once again, applicant respectfully stresses that Cornett's applicability is for the planning of future maintenance events and not for present performance of such events on the equipment work site, and, thus, the communication and ergonomic features addressed by aspects of the present invention would likely be viewed as unnecessary features, (e.g., resulting in unnecessary incremental costs) for the system of Cornett.

In view of the foregoing remarks, it is respectfully submitted that Cornett fails to teach or suggest any of the above-noted operational and/or structural relationships, and, consequently, does not and cannot anticipate claim 1 under the statutory standards of § 102. Since each of claims 3-18 that depend from claim 1 includes the structural and/or operational relationships respectively recited in such independent claim 1, it is also respectfully submitted that the

applied art also fails to anticipate or otherwise render unpatentable each of such dependent claims.

Claim 19 is directed to computerized method for self-directed assistance of equipment service personnel identifying replacement parts for selected locomotive equipment and a selected system thereof while present at an equipment work site to perform a servicing operation for a locomotive. Detailed parts data, as may be stored in a database, includes graphical reproductions of the selected equipment with each reproduction being arranged into selectable segments comprising a plurality of graphical hyperlinks embedded on such graphic representations of the selected locomotive equipment. At least some of the plurality of graphical hyperlinks embedded on the respective graphical representations of the selected locomotive equipment are activated for remotely retrieving from the database detailed parts data about a selected assembly using a level of representation sufficiently detailed to enable service personnel to perform a desired service of the selected assembly. It is respectfully submitted, as discussed above, that Cornett also fails to anticipate or otherwise render unpatentable claim 19 since Cornett fails to teach or suggest the structural and/or operational relationships respectively recited in claim 19.

Claim 20 is directed to a computerized system for servicing a locomotive and identifying replacement parts for selected locomotive equipment and a selected system thereof. The identification of the parts is performed by service personnel as that personnel performs a servicing operation for the locomotive. It is respectfully submitted, as discussed above, that Cornett also fails to anticipate or otherwise render unpatentable claim 20 since Cornett fails to teach or suggest the structural and/or operational relationships respectively recited in claim 20.

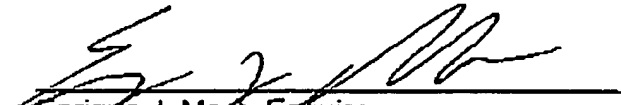
It is respectfully submitted that each of the claims pending in this application recites patentable subject matter and it is further submitted that such

claims comply with all statutory requirements and thus each of such claims should be allowed.

The applicant appreciates the Examiner's efforts for conducting a thorough examination, and cordially invites the Examiner to call the undersigned attorney if there are any outstanding items that may be resolved via telephone conference.

Dated this 16<sup>th</sup> day of June, 2004.

Respectfully submitted,



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